

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6309-Cr-Seitz

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSEPH RUSSO and DOREEN RUSSO,
et al,

Defendants.

MOTION FOR EXTENSION OF TIME TO FILE PRETRIAL MOTIONS

The Defendant, Joseph Russo, by and through undersigned counsel, hereby requests an extension of time in which to file pretrial motions, and in support thereof states:

1. The deadline for filing pretrial motions is Monday, November 19, 2001.
2. Undersigned counsel's father was hospitalized yesterday in Boca Raton, Florida. As a result, undersigned counsel has been completely unable to concentrate on finalizing the motions she has been working on.
3. Undersigned counsel has conferred with Assistant United States Attorney Diana Fernandez who indicated she has no objection to the relief requested herein.

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4. Due to the parties' schedules and the Thanksgiving holiday, the parties jointly request an extension be granted until December 3rd, which will also give counsel the opportunity to meet in person and continue ongoing discussions which may potentially resolve this case.

WHEREFORE, for the foregoing reasons, undersigned counsel respectfully requests this Honorable Court grant this motion and extend the deadline for filing motions until December 3, 2001.

Respectfully submitted,

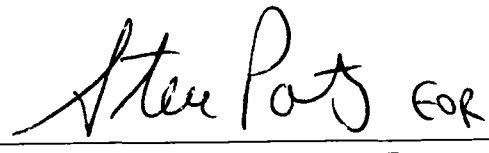
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the above and foregoing has been furnished by mail this 16th day of November, 2001 to **Brian McCormick, Esq. and Diana Fernandez, Esq., Assistant United States Attorneys**, 500 E. Broward Blvd., Suite 700, Ft. Lauderdale, FL 33394 and all defense counsel on the attached Service List.

By: _____


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